

Mr. E. Scott Smith  
Chief, Engineer, Gas Section  
Energy Regulatory Commission  
730 Schenkel Lane  
P.O. Box 615  
Frankfort, Kentucky 40602

Dear Mr. Smith:

Thank you for your letter of January 20, 1981, in which you asked us to expound on our Interpretation No. 80-9 of July 1, 1980, which provided that Part 192 applies to gathering lines outside of cities, towns, or villages if they lie within a designated residential or commercial area such as a sub-division, business or shopping center, or community development. Another interpretation is enclosed responding to your specific questions as to what would constitute a residential or commercial area outside the limits of a city, town, or village.

You also asked if we would send you copies of all of this office's interpretations for the previous three years. Copies of our interpretations are provided State agencies by the Regional Office concerned. You may obtain them from:

Mr. James C. Thomas  
Materials Transportation Bureau  
Office of Operations & Enforcement  
Southern Region, DMT-16  
Suite 200-B  
1568 Willingham Drive  
Atlanta, Georgia 30337

Sincerely,

/signed/

Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

NO. 81-2  
Date: March 18, 1981

**DEPARTMENT OF TRANSPORTATION**  
**RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION**  
**MATERIALS TRANSPORTATION BUREAU**

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**PIPELINE**  
**SAFETY REGULATORY INTERPRETATION**

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**NOTE:**

**A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.**

SECTION: 192.(b)(2)

SUBJECT: Designated residential or commercial area outside of the limits of a city, town, or village.

FACTS: None.

QUESTION: What would constitute a designated residential or commercial area outside the limits of a city, town, or village?

ANSWER: Besides the examples given in the rule, areas having a population similar to those examples that are zoned either commercial or residential by zoning ordinances would be designated residential or commercial areas because they are identified for those purposes. If such a populated area is not zoned residential or commercial, the following criteria could be used in helping to make a determination:

1. If the area is used for banking, the manufacture, warehousing, or sale of goods, or contains an office building, it would be considered commercial.
2. If the area has an apartment building, hotel, or a cluster or group of dwellings used for human habitation, it would be considered residential.

Melvin A. Judah  
Acting Associate Director

Mr. Melvin A. Judah  
Acting Associate Director  
for Pipeline Safety Regulation  
Materials Transportation Bureau  
Washington, D. C. 20590

Re: Your Interpretation No. 80-9, Dated July 1, 1980

Dear Mr. Judah:

Would you please further expound on your interpretation No.80-9 dated July 1, 1980, concerning applicability of Part 192 to onshore gas gathering lines outside of city limits. Your interpretation states that gathering lines outside the limits of a city, town or village are covered under Part 192 if they are located within a residential or commercial area. What would constitute a residential or commercial area outside the limits of a city, town, or village? We have a tremendous amount of gathering lines in the eastern part of our state and this information is extremely important to our Commission.

I would ask another favor of you, unrelated to the interpretation request listed above. For some unexplained reason we do not receive copies of all interpretations concerning natural gas issued by your office. Would you please send this Commission copies of all your interpretations for the previous three years?

Thank you for your help.

Very truly yours,

ENERGY REGULATORY COMMISSION

E. Scott Smith  
Chief Engineer, Gas Section